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April 20, 2004

**Sent via U.S. Mail and electronic mail**

Robert Culpepper  
BellSouth Legal Department  
675 West Peachtree Street  
Suite 4300  
Atlanta, GA 30375

Re: *Analysis of Continued Availability of Unbundled Local Switching for Mass Market Customers Pursuant to the Federal Communication's Commission's Triennial Review Order*; Docket No. 2003-326-C

Dear Robert:

I am writing with regard to BellSouth's First Requests for Admissions, Second Set of Interrogatories, and Second Requests for Production of Documents to AT&T in the above-referenced docket before the South Carolina Public Service Commission. This discovery was also served in the same case in Florida, *In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE review: Local Circuit Switching for Mass Market Customers*, Docket No. 030851-TP ("the Florida docket"). AT&T's responses in this docket are the same as the responses provided in the Florida docket. AT&T represents that with one exception, there has been no activity since the time that the Florida discovery was answered that would require AT&T to update and/or modify its Florida discovery responses and production of documents. That exception is that because testimony continues to be filed in other states, Don Wood has made additional BACE model runs. Those were provided in the Florida discovery responses and will be updated and provided to you as soon as possible. AT&T agrees with BellSouth that if and when this proceeding resumes, the discovery from the Florida docket should be introduced into the record at the appropriate time.

It is my understanding that in light of these circumstances, as well as BellSouth's reservation of its right to seek formal or supplemental discovery responses if necessary to comply with any Commission Order and/or to properly introduce the Florida responses into the record of this proceeding, BellSouth will accept this letter and the planned updates to the BACE model runs as AT&T's response to the referenced South Carolina discovery.

Sincerely,

A handwritten signature in cursive script that reads "Martha Ross-Bain".

Martha M. Ross-Bain

cc: Meredith Mays, Esq.  
Patrick Turner, Esq.  
John J. Pringle, Jr., Esq.  
Michael J. Henry, Esq.